

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

**MWK RECRUITING, INC. and  
COUNSEL HOLDINGS, Inc.**

**Plaintiff,**

**v.**

**EVAN P. JOWERS,**

**Defendant/Judgment  
Debtor.**

**Civil Action No. 1:18-cv-00444-RP**

**NOTICE OF ACTIVITY IN HK ACTION**

Plaintiff MWK Recruiting, Inc. (now known as Counsel Holdings, Inc.) (“Plaintiff”) hereby provides notice to the Court of the attached communication received from DLA Piper in Hong Kong proposing a stay of the HK Action considering Plaintiff’s requested injunction of the HK Action. This communication, while not an acknowledgment of the Court’s jurisdiction and the likely outcome of the injunction motion, at least demonstrates Jowers’s counsel in Hong Kong recognizes that the two matters are intertwined. In addition, Jowers is defending Plaintiff’s request in the HK Action that he be ordered there to post security for costs by claiming he has “substantial assets” in Hong Kong. His requested stay may be viewed by the Court as an indication Jowers seeks freedom to move those assets before the Court rules on the other relief recently requested by Plaintiff. *See* Dkt. 373, Dkt. 375, Dkt. 376.

Dated: December 1, 2022

Respectfully Submitted,

/s/ Robert E. Kinney

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